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Attorneys for Plaintiffs

UNITED STATES DISTRICT COURT  
CENTRAL DISTRICT OF CALIFORNIA  
WESTERN DIVISION

JERALD FRIEDMAN, Individually and  
on Behalf of All Others Similarly  
Situating,

Plaintiff,

vs.

AARP, INC., AARP SERVICES INC.,  
AARP INSURANCE PLAN,  
UNITEDHEALTH GROUP, INC. and  
UNITEDHEALTHCARE INSURANCE  
COMPANY,

Defendants.

Case No. 2:14-cv-0034-DDP-PLA

CLASS ACTION

DECLARATION OF STUART A.  
DAVIDSON IN SUPPORT OF  
PLAINTIFFS' MOTION FOR CLASS  
CERTIFICATION

Judge: Hon. Dean D. Pregerson

Magistrate: Hon. Paul L. Abrams

Hearing: February 25, 2019

Time: 10:00 a.m.

1 I, STUART A. DAVIDSON, declare as follows:

2 1. I am an attorney duly licensed to practice before all of the courts of  
3 the State of Florida. I am a member of the law firm of Robbins Geller Rudman &  
4 Dowd LLP, and I am one of the attorneys of record for plaintiffs Jerald Friedman  
5 and Carol McGee (collectively, "Plaintiffs") in this case. I have personal  
6 knowledge of the matters stated herein, and, if called upon, I could and would  
7 competently testify thereto.

8 2. The foregoing exhibits are being submitted in connection with  
9 Plaintiffs' Motion for Class Certification:

10 **Exhibit A** Hr'g Tr., *Dane v. UnitedHealthcare Ins. Co.*, No. 2:18-cv-  
11 0792-SRU (D. Conn. Nov. 13, 2018).

12 **Exhibit B** Memorandum to ASI Board of Directors dated August 16,  
13 2013, AARP\_FRI\_00017794.

14 **Exhibit C** Excerpts from Deposition of Jerald Friedman.

15 **Exhibit D** Excerpts from Deposition of Carol McGee.

16 **Exhibit E** Robbins Geller Rudman & Dowd LLP Firm Resume.

17 **Exhibit F** Sean K. Collins Biography.

18 I declare under penalty of perjury under the laws of the United States of  
19 America that the foregoing is true and correct. Executed this 26th day of December  
20 2018, at Boca Raton, Florida.

21 s/ Stuart A. Davidson  
22 STUART A. DAVIDSON  
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27 DAVIDSON DECL. ISO  
28 PLTFS' MOT. FOR CLASS CERT.  
2:14-cv-00034-DDP-PLA

CERTIFICATE OF SERVICE

I hereby certify that on December 26, 2018, I authorized the electronic filing of the foregoing with the Clerk of the Court using the CM/ECF system which will send notification of such filing to the e-mail addresses denoted on the attached Electronic Mail Notice List, and I hereby certify that I caused to be mailed the foregoing document or paper via the United States Postal Service to the non-CM/ECF participants indicated on the attached Manual Notice List.

I certify under penalty of perjury under the laws of the United States of America that the foregoing is true and correct. Executed on December 26, 2018.

s/ Stuart A. Davidson  
STUART A. DAVIDSON

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DAVIDSON DECL. ISO  
PLTFS' MOT. FOR CLASS CERT.  
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